

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00167-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

LG ELECTRONICS INC., LG  
ELECTRONICS U.S.A., INC.,

Defendants.

Case No. 6:21-cv-00168-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 6:21-cv-00169-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 6:21-cv-00361-ADA

SONRAI MEMORY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-401-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

KINGSTON TECHNOLOGY COMPANY,  
INC. and KINGSTON TECHNOLOGY  
CORPORATION

Defendant.

Case No. 6:21-cv-01284-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

WESTERN DIGITAL TECHNOLOGIES,  
INC.,

Defendant.

Case No. 6:21-cv-01168-ADA

**DECLARATION OF LUCA FASOLI IN SUPPORT OF  
DEFENDANTS' OPPOSED MOTION TO STAY  
PENDING FINAL RESOLUTION OF PLAINTIFF'S MANUFACTURER LAWSUITS**

I, Luca Fasoli, hereby declare as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I am a Senior Vice President of Memory Product Solutions at Western Digital

Technologies, Inc. ("Western Digital"). I have worked at Western Digital or SanDisk, the latter

of which was acquired by Western Digital during my tenure, since 2001.

3. As Senior Vice President of Memory Product Solutions at Western Digital, I have responsibilities that include the configuration and testing of Western Digital's SanDisk branded flash memory products. I have had responsibilities related to the design and operation of flash memory products for Western Digital or SanDisk, the latter of which was acquired by Western Digital.

4. I provide this declaration on behalf of Western Digital. The statements in this declaration are based on my personal knowledge. If called to testify as a witness, I could and would testify competently and truthfully to each of the statements under oath.

5. Based on the Complaints filed against Western Digital and Dell Technologies, Inc., I understand that Plaintiff is accusing SanDisk/Toshiba 64L 3D NAND flash chips with the die identifier FRN1256G ("Accused Kioxia and Western Digital Chips") of infringing U.S. Patent Nos. 6,724,241 (the "'241 patent") and 7,436,232 (the "'232 patent").

6. Western Digital and Kioxia Corporation ("KIC") collaborate in designing certain NAND flash memory chips, including the Accused Kioxia and Western Digital Chips at issue here. KIC took the lead in designing the Accused Kioxia and Western Digital Chips.

7. Western Digital and KIC employ the engineers and other employees responsible for developing and designing the Accused Kioxia and Western Digital Chips. Western Digital and KIC alone also have the factual information and related documents showing the design and operation of the accused circuitry of the Accused Kioxia and Western Digital Chips.

8. Because this information regarding the circuit design and manufacture of the Accused Kioxia and Western Digital Chips is proprietary and strictly confidential, Western Digital does not share it with third parties, including any customers, and it remains in the

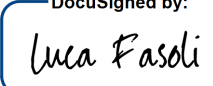
possession of Western Digital and/or KIC. Western Digital and KIC collectively are the exclusive source for information regarding the manufacture, design, and operation of the accused circuitry of the Accused Kioxia and Western Digital Chips.

9. Downstream customers, such as Apple, Dell, Google, LG, Samsung and Kingston (“Customer Defendants”), may acquire and incorporate Accused Kioxia and Western Digital Chips into their downstream products. However, customers, including the Customer Defendants, do not have the ability to make any modifications to the Accused Kioxia and Western Digital Chips and instead integrate the Accused Kioxia and Western Digital Chips “as is” with respect to their circuit designs.

10. Western Digital possesses substantial information regarding the manufacture and design of the Accused Kioxia and Western Digital Chips

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Campbell, California, on December 17, 2021.

DocuSigned by:  
  
E22AE4B188A746D...

---

Luca Fasoli